

FILED 18 MAR 25 2025 USDC ORP

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNDER SEAL

UNITED STATES OF AMERICA **3:25-cr-00108-AN**

v.

INDICTMENT

ADAM MATTHEW LANSKY,
Defendant. **18 U.S.C. § 844(i)**
26 U.S.C. § 5861(d)

Forfeiture Allegation

UNDER SEAL

THE GRAND JURY CHARGES:

COUNT 1

(Attempted Arson of Property Used in Interstate Commerce)
(18 U.S.C. § 844(i))

On or about January 20, 2025, in the District of Oregon, defendant **ADAM MATTHEW LANSKY**, maliciously attempted to damage and destroy, by means of fire, the building located at 2755 Mission Street, Salem, Oregon, facilities used in interstate commerce and affecting interstate commerce;

In violation of Title 18, United States Code, Section 844(i).

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COUNT 2
(Attempted Arson of Property Used in Interstate Commerce)
(18 U.S.C. § 844(i))

On or about January 20, 2025, in the District of Oregon, defendant **ADAM MATTHEW LANSKY**, maliciously attempted to damage and destroy, by means of fire, a red Tesla, Model X, VIN 7SAXCBE55RF460763 vehicle located at 2755 Mission Street, Salem, Oregon, a vehicle used in and affecting interstate commerce;

In violation of Title 18, United States Code, Section 844(i).

COUNT 3
(Unlawful Possession of an Unregistered Destructive Device)
(26 U.S.C. § 5861(d))

On or about January 20, 2025, in the District of Oregon, defendant **ADAM MATTHEW LANSKY** did knowingly and unlawfully possess a destructive device, a Molotov cocktail, not registered to him in the National Firearms Registration and Transfer Record;

In violation of Title 26, United States Code, Sections 5841, 5861(d) and 5871.

FIRST FORFEITURE ALLEGATION

Upon conviction of the offenses alleged in Count 1 or Count 2, defendant **ADAM MATTHEW LANSKY** shall forfeit to the United States, pursuant to 18 U.S.C. § 844(c) 18 U.S.C. § 981(a)(1)(G) & 18 U.S.C. § 2461, any explosive materials involved in or used or intended to be used in the violations set forth in Count 1 and Count 2, including the Molotov cocktails involved in those offenses.

SECOND FORFEITURE ALLEGATION

Upon conviction of the offense alleged in Count 3, defendant **ADAM MATTHEW LANSKY** shall forfeit to the United States, pursuant to 49 U.S.C. § 80303, 26 U.S.C. § 5872 &

28 U.S.C. § 2461, any firearm/destructive device received or possessed by defendant, which is not registered to him in the National Firearms Registration and Transfer Record, including the Molotov cocktail involved in the offense set forth in Count 3.

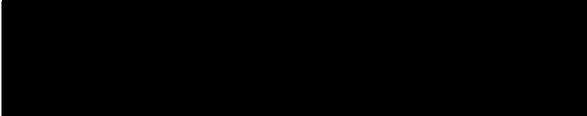
If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

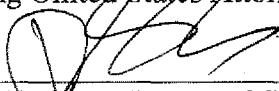
Dated: March 18, 2025

A TRUE BILL.


OFFICIATING FOREPERSON

Presented by:

WILLIAM M. NARUS
Acting United States Attorney



PARAKRAM SINGH, OSB #134871
Assistant United States Attorney